

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re ENRON CORPORATION
SECURITIES, DERIVATIVE &
"ERISA" LITIGATION

MDL 1446

SILVERCREEK MANAGEMENT, INC.,	§	
et al	§	
Plaintiffs,	§	
v.	§	C.A. NO. H-03-0815
	§	
CITIGROUP, INC., et al	§	JURY TRIAL DEMANDED
Defendants.	§	

**DEFENDANT RICHARD A. CAUSEY'S ANSWER TO THE THIRD AMENDED
COMPLAINT OF PLAINTIFFS, SILVERCREEK MANAGEMENT INC.,
SILVERCREEK LIMITED PARTNERSHIP, SILVERCREEK II LIMITED, OIP
LIMITED, AND PEBBLE LIMITED PARTNERSHIP**

COMES NOW Defendant Richard A. Causey ("Causey"), subject to and without waiving his Motion to Dismiss State Law Claims, and files this Answer to the Third Amended Complaint of Plaintiffs, Silvercreek Management Inc., Silvercreek Limited Partnership, Silvercreek II Limited, OIP Limited, and Pebble Limited Partnership ("Plaintiffs"), and would show the Court as follows:

Causey answers the allegations contained within the separately numbered paragraphs of Plaintiffs' Third Amended Complaint. as follows:

1. As to paragraphs 1 through 931, admitted that Richard A. Causey at certain times served as Chief Accounting Officer of Enron Corp. As to all other allegations in paragraphs 1 through 931 and the Prayer for Relief, Causey respectfully declines to respond to the allegations

based on his Constitutional rights against self-incrimination, including but not limited to his rights under the Fifth Amendment of the United States Constitution.

JURY DEMAND

2. Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Defendant Richard A. Causey hereby demands a jury.

CONCLUSION

BASED UPON THE FOREGOING, Defendant Richard A. Causey prays that the Plaintiffs take nothing by way of their Complaint, that the Complaint be dismissed with prejudice as to this Defendant, that Defendant be exonerated from all fault or liability herein, and that Defendant be granted such other and further relief to which he may be justly entitled.

Respectfully submitted,

/s/ C. Robert Mace

C. Robert Mace

Fed Bar No. 1415

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**ATTORNEY-IN-CHARGE FOR DEFENDANT,
RICHARD A. CAUSEY**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document has been served by sending a copy via electronic mail to serve@ESL3624.com on this the 22nd day of September, 2011.

I further certify that a copy of the foregoing document has been served via Certified Mail/Return Receipt Requested on the following parties, who do not accept service by electronic mail on this the 22nd day of September, 2011.

Carolyn S. Schwartz
United States Trustee, Region 2
33 Whitehall St., 2151 Floor
New York, NY 10004
Telephone: (212) 510-0500
Facsimile: (212) 668-2255

_____/s/ C. Robert Mace
C. Robert Mace